

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

CASE NO. 24-cv-40 EAW-MJR

DECLARATION OF LEWIS W. BEILIN

As provided by 28 U.S.C. § 1746, I, Lewis W. Beilin, hereby declare as follows:

1. I am an adult resident of the State of Wisconsin, employed as an Assistant Attorney General in the Wisconsin Department of Justice. I represent Plaintiff State of Wisconsin in this case.

2. On February 5, 2025, at 2:23 pm CT, I received an email from Attorney Joseph Sanders (CFPB). In addition to other CFPB attorneys and supervisors, the email was addressed to the following counsel at Reed Smith LLP representing Defendants Ryan Sasson, Daniel Blumkin, Albert Ian Behar, and their wholly-owned companies, Twist Financial, LLC, Duke Enterprises, LLC, and Blaise Investments, LLC, in this case: Lara T. Gatz, James C. McCarroll, Gregory D. Speier, A. Scott Bolden, Kim M. Watterson, and Patrick M. Yingling.

3. A true and correct copy of that email—including the earlier email from Attorney Gatz to CFPB staff to which it responded—is attached hereto as **Exhibit A**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2025.

/s/ Lewis W. Beilin
LEWIS W. BEILIN

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